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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA, Plaintiff, vs. ETHAN ELLIOT ERHARDT, Defendant.	2:19-cr-00249-JCM-BNW **STIPULATION FOR A PROTECTIVE ORDER**

The parties, by and through the undersigned, respectfully request that the Court issue an Order protecting from disclosure to the public, or any third party not directly related to this case, any law enforcement reports, transcripts, recordings, and/or other materials provided by the Government during discovery in this case (the "Protected Material"). The parties state as follows:

1.   The indictment in this case issued on October 1, 2019.

2.   Trial is currently set for December 2, 2019. The Government desires and intends to produce discovery as soon as possible.

3.   The indictment in this case arises out of alleged false representations made by the defendant during the purchase of firearms.

4.   The Government believes that dissemination of the Protected Material could threaten related ongoing investigations involving suspected trafficking of firearms and reveal personal identifying information of potential witnesses.

5.   In order to protect the integrity of related investigations and the witnesses involved in and revealed by the Protected Material, the parties intend to restrict access to the Protected Material in this case to the following individuals: the defendants, attorneys for all parties, and any personnel that the attorneys for all parties consider necessary to assist in performing that attorneys' duties in the prosecution or defense of this case, including investigators, paralegals, experts, support staff, interpreters, and any other individuals specifically authorized by the Court (collectively, the "Covered Individuals").

6.   Without leave of Court, the Covered Individuals shall not:

    a.   make copies for, or allow copies of any kind to be made by any other person of the Protected Material in this case or permit dissemination of the Protected Material at the Pahrump jail facility, or any other detention facility where the Defendant is housed, to include leaving a copy of the Protected Material at any detention facility where the Defendant is housed;

    b.   allow any other person to read, listen, or otherwise review the Protected Material;

    c.   use the Protected Material for any other purpose other than preparing to defend against or prosecute the charges in the indictment or any further superseding indictment arising out of this case; or

    d.   attach the Protected Material to any of the pleadings, briefs, or other court filings except to the extent those pleadings, briefs, or filings are filed under seal.

7.   Nothing in this stipulation is intended to restrict the parties' use or introduction of the Protected Material as evidence at trial or support in motion practice.

8.   The parties shall inform any person to whom disclosure may be made pursuant to this order of the existence and terms of this Court's order.

9.   Should a reasonable need for this protective order cease to exist, on grounds other than a Covered Individual or some other person violating or circumventing its terms, the Government will move expeditiously for its dissolution.

10.   The defense hereby stipulates to this protective order.
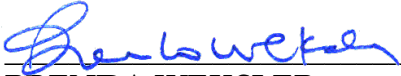
Respectfully submitted,
For the United States:

NICHOLAS A. TRUTANICH
United States Attorney
Nevada Bar Number 13644

_____/s/_____
DANIEL E. CLARKSON
Assistant United States Attorney

For the defense:

_____/s/_____
DAMIAN R. SHEETS
Attorney for ETHAN ERHARDT

IT IS SO ORDERED:

November 12, 2019

_____   _____
BRENDA WEKSLER   Date
United States Magistrate Judge

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